

MAR 21 2017

Mr. Lawrence C. Rosen
Environmental Operations, Inc.
1530 South Second Street, Suite 200
St. Louis, Missouri 63104-4500

RE: Comments on the January 24, 2017, Indoor Air Sampling Results for the Ahrens Office Building at the Former Solutia - J.F. Queeny Site, St. Louis, Missouri
EPA ID # MOD004954111

Dear Mr. Rosen:

The U.S. Environmental Protection Agency Region 7 in consultation with the Missouri Department of Natural Resources, has completed its review of the subject sampling results and are providing the following comments.

1. Cis-1,2-dichloroethene and vinyl chloride should be added to the list of analytical constituents for future indoor air samples collected at the Ahrens office building, as they are breakdown constituents of trichloroethene that can pose a potential health risk when present above their respective screening level threshold concentration.
2. The current EPA Region 7 vapor intrusion risk management guidance (enclosed) recommends that continued indoor air monitoring or vapor intrusion mitigation be performed at the Ahrens office building based on the most recent sub-slab and indoor air sampling results. Although the approved work plan for vapor intrusion sampling at the Ahrens property calls for one additional round of indoor air sampling later this spring, additional indoor air sampling consistent with the EPA guidance (OSWER Publication 9200.2-154) would be appropriate given current site conditions.
3. Pre-emptive vapor intrusion mitigation for the Ahrens office building should be considered at this time. The rationale for mitigation is supported by several significant site conditions. First, the sub-slab TCE vapor concentrations are as high as 285 times the soil gas industrial exposure action level; Second, limited indoor air sampling has demonstrated the likelihood of sub-slab TCE vapor migration into the indoor air; Third, TCE poses significant health risks from acute exposures as well as chronic exposures; and fourth, indoor air TCE concentrations are relatively close to the TCE action level. Furthermore, consideration should be given to the cost of installing a vapor intrusion mitigation system versus quarterly indoor air sampling for the foreseeable future.

If you wish to discuss this matter further, please call me at (913) 551-7755.

Sincerely,

Bruce A. Morrison
Project Manager
Waste Remediation and Permitting Branch
Air and Waste Management Division

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CONCURRENCES		
SYMBOL	WRAP	WRAP
NAME	Morrison	Johnson
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Enclosure

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